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Attorneys for Defendant, PA SOLUTIONS, INC.

UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

CAMERON DYESS, an individual,  
  
Plaintiff,

vs.

ESTATE OF JAJUAN LEE MORTON,  
Deceased; DONYELL SHAJUAN  
HANKINS as Personal Representative of  
the ESTATE OF JAJUAN LEE MORTON,  
Deceased; PA SOLUTIONS, INC., a  
Michigan Corporation; and DOES 1 through  
20, inclusive,  
  
Defendants.

CASE NO. 4:20-cv-00909-HSG  
*[Assigned for All Purposes to the Honorable  
Haywood S. Gilliam, Jr.; Courtroom 2]*

**(REVISED) CIVIL LOCAL RULE 6-2  
JOINT STIPULATED REQUEST FOR  
ORDER CHANGING TIME & ORDER  
THEREON (as modified)**

Action Filed: November 22, 2019  
Trial Date: July 6, 2021

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Plaintiff Cameron Dyess and Defendants Estate of Jajuan Lee Morton, and PA Solutions, Inc. (collectively “the Parties”), pursuant to Local Rules 6-1, 6-2, and 7-12, submit this revised stipulation to continue the current trial date and attendant deadlines, subject to the Court’s approval, as follows:

On May 13, 2020, the Court issued a Scheduling Order, setting this matter for jury trial on July 6, 2021 with the following dates set per the Court’s Scheduling Order:

EVENT	DATE
Amendment of Pleadings	July 11, 2020
Close of Fact Discovery	April 9, 2021
Expert Disclosure Deadline	February 1, 2021
Rebuttal Expert Disclosure Deadline	March 1, 2021
Close of Expert Discovery	March 19, 2021
Dispositive Motion Hearing Deadline	April 1, 2021 at 2:00 p.m.
Pretrial Conference	June 28, 2021 at 3:00 p.m.
5-Day Jury Trial	July 6, 2021 at 8:30 a.m.

The Parties agree and stipulate that the discovery necessary to prepare this matter for mediation and trial cannot be completed by the above deadlines. The Parties further agree and stipulate that the delay in discovery is due to events beyond the parties’ control and which, despite their best efforts, cannot be rectified. The delays are due to the COVID pandemic and the multi-state locations of the Parties and medical providers. These delays include the inability to obtain complete medical records and billing, which adversely impacts the Parties’ ability to retain experts and to schedule depositions of medical providers, as well as ongoing document discovery between the parties, which will necessitate depositions of party representatives and employee witnesses.

The Parties agree and stipulate that a resetting of the dates set forth in the Court’s Scheduling Order, including the trial date, is needed to permit the Parties to complete the discovery necessary for mediation and trial.

The Parties agree and stipulate that this stipulation is made in good faith in the interests of judicial economy and efficiency of resources of the Court and the Parties and is not for the purposes of delay.

IT IS STIPULATED AND AGREED, by and between the parties and their undersigned counsel of record, that the trial date be moved to November 8, 2021, and that the attendant deadlines set forth in the Scheduling Order be moved as follows:

EVENT	DATE
Close of Fact Discovery	August 2, 2021
Expert Disclosure Deadline	July 1, 2021
Rebuttal Expert Disclosure Deadline	July 30, 2021
Close of Expert Discovery	August 31, 2021
Dispositive Motion Hearing Deadline	August 5, 2021 at 2:00 p.m.
Pretrial Conference	October 26, 2021 at 3:00 p.m.

DATED: January 7, 2021

ERSKINE LAW, PC

*/s/ Jonathan M. Shugart*

BY: \_\_\_\_\_

JONATHAN M. SHUGART, ESQ.

Attorneys for Plaintiff, CAMERON DYESS

DATED: January 7, 2021

LAW OFFICES OF JOHN A. HAUSER

*/s/ Laurie J. Elza*

BY: \_\_\_\_\_

LAURIE J. ELZA, ESQ.

Attorneys for Defendant, PA SOLUTIONS, INC.

DATED: January 7, 2021

LEWIS BRISBOIS BISGAARD & SMITH, LLP

*/s/ Andrew C. Hubert*

BY: \_\_\_\_\_

ANDREW C. HUBERT, ESQ.

Co-Counsel for Defendant, PA SOLUTIONS, INC.

1 DATED: January 7, 2021

KNUDTSON & ASSOCIATES, PC

2 /s/ Gigi Knudtson

3 BY: \_\_\_\_\_

GIGI KNUDTSON, ESQ.

4 Attorneys for Defendant, ESTATE OF JAJUAN  
5 LEE MORTON  
6

7 **IT IS SO ORDERED.** The trial previously set for July 6, 2021 is being continued to  
8 November 8, 2021 at 8:30 a.m.

9 DATED: 1/8/2021

  
HON. HAYWOOD S. GILLIAM, JR.

10 UNITED STATES DISTRICT COURT JUDGE  
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